

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

ELLENOR ZINSKI,)	
)	
Plaintiff,)	
)	
v.)	Case No. <u>6:24-cv-41-NKM</u>
)	
LIBERTY UNIVERSITY, INC.,)	
)	
Defendant.)	

**DEFENDANT LIBERTY UNIVERSITY'S NOTICE THAT MOTION TO STAY
DISCOVERY IS RIPE FOR ADJUDICATION WITHOUT HEARING**

Pursuant to Local Rule 11(b) and the Court's current Scheduling Order (dkt. 15, ¶11), Defendant Liberty University, Inc. ("Liberty University") hereby files this Notice that its Motion to Stay Discovery Pending Adjudication of its Motion to Dismiss (dkt. 25) is ripe for adjudication without a hearing. Liberty University does not request a hearing on its Motion to Stay (dkt. 25).

Respectfully submitted,

/s/ Daniel J. Schmid
Mathew D. Staver*
Horatio G. Mihet*
Daniel J. Schmid (VA Bar 84415)
Attorneys for Defendant Liberty University, Inc.
LIBERTY COUNSEL
P.O. Box 540774
Orlando, FL 32854
Phone: (407) 875-1776
Email: court@LC.org
hmihet@LC.org
dschmid@LC.org

*Admitted Pro hac vice

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2024, I caused a true and correct copy of the foregoing to be electronically filed with this Court. Service will be effectuated on all counsel of record via this Court's ECF/electronic notification system.

/s/ Daniel J. Schmid

Daniel J. Schmid